



February 28, 2011  
Via ECFS

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**  
**2010 CPNI Certification Filing for Stargate Mobile, Inc.**  
**Form 499 Filer ID 828538**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2011-02, DA 11-159, EB Docket No. 06-36, released January 28, 2011 and pursuant to 47 C.F.R. § 64.2009(e), Stargate Mobile, Inc. files its Certification of Customer Proprietary Network information (CPNI) for the year 2010. Please include this Certification in EB Docket No. 06-36.

Any questions you may have concerning this filing may be directed to me at 470-740-3002 or via email to [cwrightman@tminc.com](mailto:cwrightman@tminc.com).

Sincerely,

/s/Connie Wightman  
Consultant to Stargate Mobile, Inc.

CW/lw

Attachments

cc: Best Copy and Printing - (FCC@BCPIWEB.COM)  
cc: Bruce Deer, Spread Telecommunications, LLC  
file: Stargate Mobile - FCC  
tms: FCCx1101

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

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Annual 64.2009(e) CPNI Certification for: Calendar Year 2010

Name of Company covered by this certification: Stargate Mobile, Inc.

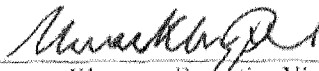
Form 499 Filer ID: 828538

Name of Signatory: Norman Klugman

Title of Signatory: Executive Vice President

I, Norman Klugman, certify and state that:

1. I am the Executive Vice President of Stargate Mobile, Inc., and, acting as an agent of the Company, I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules *See 47 C.F.R. §64.2001 et seq.*
2. Attached to this certification as Exhibit A is an accompanying statement explaining how Stargate Mobile, Inc.'s procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in § 64.2001 *et seq.* of the Commission's rules.
3. The Company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Company has not received any Customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
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Norman Klugman, Executive Vice President  
Stargate Mobile, Inc.

2/24/2011  
\_\_\_\_\_  
Date

Exhibit A

Statement of CPNI Procedures and Compliance

**Stargate Mobile, Inc.**

Calendar Year 2010

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

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Stargate Mobile, Inc.

Statement of CPNI Procedures and Compliance

Stargate Mobile, Inc. ("Company" or "Stargate") operates primarily as a resale provider of prepaid mobile services to transient end users. Therefore, most of its services consist of casual traffic provided outside of any subscribed service relationship. For these services, Stargate does not have any information that relates to the quantity, technical configuration, type, or location of the customer's service and does not validate any name or address information obtained. When the service is provided outside of any subscribed service relationship, Stargate does not obtain any CPNI that can be used for marketing purposes.

Stargate also provides recurring prepaid mobile card service. For this service, the customer obtains a SIM card and a Personal Identification Number (PIN). The customer sets up the account online with an email address of record and customer provided password. The provision and/or marketing of services that involve CPNI on these accounts, follows the applicable rules set forth in 47 CFR Subpart U, including, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical or account information, that it notifies customers of account changes.

Stargate has processes in place to safeguard the call detail information that is obtained through the use of their prepaid wireless services from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to these records.

Specifically, Stargate will provide international call detail to our prepaid wireless customers (who do not otherwise receive it). Each prepaid wireless customer (i.e., end user) can have access to his/her call detail and balance information online. Consistent with the applicable rules

set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information and customer notification of changes, online access requires a password that the customer creates. Alternatively, the customer may contact our customer service department, and after providing this self-created password to the customer service agent, may obtain call detail and balance remaining. In the event the wireless customer has forgotten his password, he/she will ONLY be provided information by the customer service agent after the subscriber has provided recent calling pattern/phone#/etc that only he/she will know. Home address and customer name information is not acceptable as a means of verification as it can be readily obtained over the internet.

The Stargate CPNI protection procedures are addressed in the Company employee manual. Stargate began operations in 2010 and plans to review CPNI procedures annually with all employees. The Company is in the process of instituting a corresponding disciplinary process to ensure that its employees understand and comply with restrictions regarding the use and disclosure of, and access to CPNI and call detail records. Employees who fail to adhere to the Company's policies will be subject to escalating disciplinary measures ranging from oral and written reprimands, to possible termination of employment. Such measures have not been necessary to date.

At this point in time, Stargate has only two employees with access to CPNI. They have procedures in place to notify law enforcement in the event of a breach of the call detail records that the company has obtained from the provision of services. All such notifications would be escalated to and handled by the Executive Vice President. For recurring card customers, we have the ability to notify customers of any such breach. We have not had any breaches during 2010, but have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

The Company does not have any retail locations and, therefore, does not disclose CPNI at in-store locations. Cards with prepaid mobile calling minutes are available at retail locations, but no CPNI is available at those locations.

Law enforcement requests for call detail records are only granted if submitted by verified law enforcement agencies.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release or disclosure of call detail records in calendar year 2010.

We have no information with respect to the processes pretexters may use to attempt to access CPNI employees are instructed to refer inquiries that appear to be suspicious to their supervisor or the Chief Technical Officer.